

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

United States District Court  
Southern District of Texas  
FILEDfor the  
Southern District of Texas

JUN 28 2016

United States of America )  
v. )  
Jesus Salvador LARA-Perez aka: )  
Salvador LARA )  
YOB: 1989 Citizenship: Mexico )

David J. Bradley, Clerk

Case No. M-16-1221-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 28, 2016 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)(A)

Receipt of Child Pornography

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

Approved to file

AUSA

Complainant's signature

Nicholas J. Ilg HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/28/20164:45 pm

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter E. Orsmy

Printed name and title

**Attachment "A"**

On November 8, 2015, Department of Homeland Security Investigations (HSI) special agent (SA) Joseph B. Baker began an internet investigation to identify person(s) using peer-to-peer (P2P) software on the internet to traffic child pornography. SA Baker identified a computer, located at IP address (internet protocol) 24.243.98.229 as offering to participate in the distribution of movies with titles that were suggestive of child pornography. One particular movie was viewed and determined to meet the federal definition of child pornography.

Further investigation performed into IP address 24.243.98.229 revealed that it was being utilized from an apartment located in McAllen, Texas and that the subscriber was an individual by the name of Salvador Lara. On June 28, 2016, HSI special agents executed a federal search warrant on said apartment.

During the execution of the warrant SAs encountered Jesus Salvador LARA-Perez (hereinafter referred to as LARA).

A laptop was located in LARA's bedroom. LARA claimed ownership of the laptop, provided a password for the laptop, and stated that he alone had access to the laptop.

A preliminary on-site forensic computer examination of the laptop revealed approximately 138 video files depicting known child pornography.

SAs advised LARA of his Miranda Rights, in the English Language, on an Immigration and Customs Enforcement (ICE) Statement of Rights Document. LARA signed and initialed the document, affirming verbally and in writing that he understood his rights and wished to continue the interview.

During the recorded post-Miranda interview, LARA stated that he received the laptop approximately three (3) years ago, in late 2013 or early 2014, from a friend. LARA admitted that almost immediately he began to purposely search for, receive, and view child pornography using internet based Peer-to-Peer (P2P) file sharing networks. LARA further admitted that from early 2014 to the present he downloaded approximately 40 video files containing what he knew to be child pornography. LARA stated he understood that receipt, possession, and viewing child pornography is illegal.

Assistant United States Attorney Alex Benavides was briefed regarding the aforementioned and Federal Prosecution was accepted.